

GIBSON, DUNN & CRUTCHER LLP

A REGISTERED LIMITED LIABILITY PARTNERSHIP
INCLUDING PROFESSIONAL CORPORATIONS

1050 Connecticut Avenue, N.W. Washington, D.C. 20036-5306
(202) 955-8500 (202) 467-0539 Fax
www.gibsondunn.com

November 13, 2001

PUBLIC VERSION

(202) 955-8500

Client No.
C 66296-00036

By E-Mail

Ms. Gloria Blue
Executive Secretary, TPSC
Office of the U.S. Trade Representative
600 Seventeenth Street, N.W.
Washington, DC 20508

Re: *Potential Action Under Section 203 of the Trade Act of 1974 With Regard to Imports of Certain Steel – Request of Nippon Steel Corporation to Exclude Certain Products from Import Restrictions*

Dear Ms. Blue:

On behalf of Nippon Steel Corporation (“NSC”), we are submitting the enclosed requests for the exclusion of certain products from any import restrictions that the President may impose under Section 203 of the Trade Act of 1974. These requests, which cover 14 distinct products, are being submitted pursuant to the Trade Policy Staff Committee’s October 26, 2001, notice that it will consider such requests. *See Trade Policy Staff Committee; Public Comments on Potential Action Under Section 203 of the Trade Act of 1974 With Regard to Import of Certain Steel*, 66 Fed. Reg. 54,321, 54,322-23 (Oct. 26, 2001).

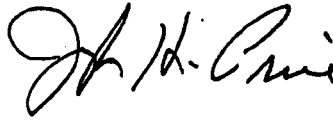
Pursuant to 15 CFR § 2003.6, we request proprietary treatment for the bracketed information included in the business confidential version of this submission, which involves information concerning NSC’s U.S. customers and U.S. sales. This information, if publicly released, could be very detrimental to NSC’s business operations. We have, however, attempted to minimize the amount of information for which proprietary treatment is being requested. In addition, we have indexed any numerical business confidential information that has been deleted from the public submission, except where such indexing would reveal sensitive information concerning NSC’s sales or business strategy.

PUBLIC VERSION

LOS ANGELES NEW YORK WASHINGTON, D.C. SAN FRANCISCO PALO ALTO
LONDON PARIS ORANGE COUNTY CENTURY CITY DALLAS DENVER

If you have any questions or need additional information, please contact any one of the undersigned. Thank you for your assistance in the filing of this submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read "J.H. Price". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Joseph H. Price
Donald Harrison
Andrea Fekkes Dynes
Gregory C. Gerdes

Attachment

Letter.doc

In the Matter of

CERTAIN STEEL PRODUCTS

BUSINESS CONFIDENTIAL
INFORMATION ENCLOSED

Comments submitted pursuant to
Trade Policy Staff Committee's
request for public comments,
66 Fed. Reg. 54,321, 54,322-23 (Oct. 26, 2001)

Nippon Steel Corporation

Request to Exclude Certain Products
From Any Import Restrictions Imposed
Under Section 203 of the Trade Act of 1974

Joseph H. Price
Donald Harrison
Andrea Fekkes Dynes
Gregory C. Gerdes

GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Ave., N.W.
Washington, DC 20036
(202) 955-8500

Attorneys for Nippon Steel Corporation

November 13, 2001

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EXECUTIVE SUMMARY

On behalf of Nippon Steel Corporation (“NSC”), we are submitting the enclosed requests to exclude certain products from any import relief that the President may impose under Section 203 of the Trade Act of 1974 (“Section 203”). These requests, which cover 14 distinct products, are being submitted in accordance with the Trade Policy Staff Committee’s October 26, 2001 notice that it will consider such requests. *See Trade Policy Staff Committee; Public Comments on Potential Action Under Section 203 of the Trade Act of 1974 With Regard to Import of Certain Steel*, 66 Fed. Reg. 54,321, 54,322-23 (Oct. 26, 2001).

Pursuant to Section 203, the President, in deciding upon appropriate action in this case, must take all feasible steps that will *both* “facilitate efforts by the domestic industry to make a positive adjustment to import competition and provide greater economic and social benefits than costs.” For the reasons discussed below, granting the product exclusions requested by NSC would help to achieve these statutory mandates. Specifically, the products for which NSC seeks product exclusions are items that are not produced in the United States and for which there are no viable domestic substitutes. Because these products do not compete with domestically-manufactured steel, excluding them from Section 203 relief would not undermine any restructuring efforts undertaken by the domestic steel producers. At the same time, many U.S. end-users would be forced to cut back or even cease production of various downstream products if access to these imported products were restricted. Indeed, many of the products discussed below have previously been expressly excluded from antidumping investigations conducted by the Commerce Department for that very reason.

Accordingly, NSC respectfully requests that the products discussed below be excluded from any import restrictions imposed by the President in this case.